

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Richard & Brenda Gaines, : **Chapter 13**
:
:
Debtor(s). : **Bankruptcy No. 19-12974-mdc**

NOTICE of Motion to Modify Plan Post-Confirmation

Debtors Richard and Brenda Gaines have filed a Motion to Modify Plan Post-Confirmation with this Court. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you want the Court to consider your views on the Motion, then on or before 2/11/2022, you or your attorney must:

File with the court a written response at:

U.S. Bankruptcy Court
900 Market Street
Philadelphia, PA 19107
Attn: Bankruptcy Clerk

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must mail a copy to:

Michelle Lee, Esq.
Margolis Edelstein
170 S Independence Mall W Ste 400E
Philadelphia, PA 19106

You or your attorney must attend the hearing scheduled to be held on **2-24-2022 11:00AM**. **Hearing will be held via Telephonic Hearing.** If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: 1/28/2022

Respectfully Submitted,
/s/ Michelle Lee
Michelle Lee, Esquire